

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**ANGEL DAVID MORALES
VALLELLANES,
Plaintiff,**

v.

**JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET ALS.,
Defendants.**

CIVIL NO. 97-2459 (GAG/CVR)

**DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES; UNFAIR
LABOR PRACTICES; BREACH OF
COLLECTIVE BARGAINING
AGREEMENT**

**TRIAL BY JURY IS HEREBY
REQUESTED**

MOTION IN LIMINE

COMES NOW, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

1. In accordance to this Honorable Court status Conference Report and Order the parties are due until August 27, 2007 to file Motions In Limine.
2. Plaintiff hereby objects and respectfully move to the Court for an order to limit and/or strike the following defendants witnesses and/or evidence from trial:
 - i) Defendant request to reserve the right to supplement said party instant witness list;
 - ii) Defendant expert witness Dr. Molinder Bhatia testimony nor his Economic Report as said expert witness nor his report was never announced by Defendant, and therefore Plaintiff did not depose him;
 - iii) Defendant witnesses Juan Rodriguez and Jose Sepúlveda as the

former was never announced before and the latter was never provided for deposition in spite of Plaintiff insistence;

- iv) Defendant request to call rebuttal witness as may be necessary without prior notice to the other party;
- v) Affirmations of Postal Employees in Caparra Heights Station- Interview conducted by Mr. Rafael Gomila as Mr. Gomila is not included as a witness;
- vi) Memo "To Whom It May Concern" dated 1/9/97 from Angel L. Baerga as to incident occurring on Saturday 28, 1996 as Mr. Baerga was never announced and not included as a witness.

WHEREFORE, it is respectfully requested from this Honorable Court that grant Plaintiff's Motion In Limine to limit Defendants witnesses and evidence as request above.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on August 27, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

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